

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Joann Morgan) Chapter 13
Debtor(s)) Case No. 19 B 06764
) Judge A. Benjamin Goldgar

Notice of Motion

Joann Morgan
3680 168th St
Country Club Hills, IL 60478

Debtor Attorney: Semrad Law Firm LLC
via Clerk's ECF noticing procedures

On May 14, 2019 at 11:00 am, I will appear at the location listed to the right, and present this motion.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 642
- > Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Saturday, May 4, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 03/12/2019.
2. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
3. The debtor(s) have failed to commit all disposable income to the plan.
4. Debtor has failed to amend Schedule I to correct the total income.
5. Debtor has failed to amend Schedule J to correct Household size.
6. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE